



December 19, 2018. The Parties have made very productive use of the first thirty (30) day extension period but need additional time to advance their negotiations.

In light of the current posture of the Parties' settlement negotiations, Plaintiff's counsel has advised that he is amenable to extending the Defendants' Answer Deadline for another thirty (30) days or until January 18, 2019.

#### **IV.**

Defendants respectfully move the Court to grant this Unopposed Motion to further extend Defendants' deadline to file an Answer or otherwise respond to Plaintiff's Complaint for a period of thirty (30) days or up to and including January 18, 2019.

As stated above, Counsel for the Plaintiff has no objection and in fact has agreed to the extension requested by Defendants.

#### **V.**

For good cause, and in accordance with Fed.R.Civ.P. 6, Defendants file this Unopposed Motion to Extend Defendants' Answer Date for a period of thirty (30) days. Good cause exists for the requested extension in that Defendants and Plaintiff are engaged in substantive settlement negotiations and require additional time to work towards a settlement of this dispute.

No party will be prejudiced by the requested extension and all parties, including Plaintiff, have consented to the requested extension.

WHEREFORE, PREMISES CONSIDERED, Defendants GOOD SPACE X, LLC and PALETAS POPL, LLC respectfully request that the Court extend the deadline for Defendants to answer or otherwise respond to Plaintiff's Complaint up to and including January 18, 2019.

Respectfully submitted,

**MUSGROVE LAW FIRM, P.C.**

By: /s/ Cami L. Boyd

Cami L. Boyd

State Bar No. 00787340

[cboyd@musgrovelaw.com](mailto:cboyd@musgrovelaw.com)

10,000 North Central Expressway

Suite 1000

Dallas, Texas 75231

Telephone: (214) 615-4147

Facsimile: (214) 615-4151

**ATTORNEYS FOR DEFENDANT  
GOOD SPACE X, LLC**

**SCHNEIDER MILLER REYNOLDS, P.C.**

By: /s/Stuart M. Reynolds, Jr.

Stuart M. Reynolds, Jr.

Texas Bar No. 16805700

Email: [stuart@schneidlaw.com](mailto:stuart@schneidlaw.com)

300 N. Coit Road, Suite 1125

Richardson, Texas 75080

(972) 479-1112 Telephone

(972) 479-1113 Telecopy

**ATTORNEYS FOR DEFENDANT  
PALETAS POP, LLC**

**CERTIFICATE OF CONFERENCE**

This is to certify that Counsel for Defendant Good Space, LLC has conferred with Douglas Schapiro, Attorney-in-Charge for Plaintiff and Stuart Reynolds, Counsel for Defendant Paletas Pop, LLC, and all Parties have agreed to the extension requested in this Unopposed Motion.

/s/ Cami L. Boyd

**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the foregoing motion was served upon all parties of record through their counsel on December 12, 2018 via the Court's ECF filing system and via electronic mail.

/s/ Cami L. Boyd